

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Karen L. Reynolds  
Special Agent: Christopher Loperfido

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America  
v.

Robert Manard Jones

Case No.

Case: 2:21-mj-30067  
Assigned To : Unassigned  
Assign. Date : 2/9/2021  
Description: USA V. ROBERT  
MANARD JONES

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 20, 2020 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 922 (g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: 2/9/2021

City and state: Detroit, MI

  
Complainant's signature

Christopher Loperfido, Special Agent - ATF  
Printed name and title

  
Judge's signature

Kimberly G. Altman, U.S. Magistrate Judge  
Printed name and title

## **AFFIDAVIT**

I, Special Agent Christopher Loperfido, being duly sworn, do hereby state the following:

### **I. INTRODUCTION**

1. I am a Special Agent, with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) United States Department of Justice, and have been so employed since December of 2018. Prior to becoming a Special Agent with the ATF, I was a United States Border Patrol Agent for nine years in Texas and Washington State. I am currently assigned to the ATF Detroit Field Division. I completed the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I received extensive training on firearms identification, common scenarios involving firearms and narcotics trafficking, and the identification and effects of controlled substances. Additionally, I received training on undercover investigations related to firearms and narcotics trafficking, which included investigative techniques and common subject behavior.

2. During the course of my employment with ATF, I have assisted with investigating criminal violations relating to firearms,

violent crime, and narcotics. I have participated in all aspects of criminal investigations, including, but not limited to, interviews, physical surveillance, and the execution of search warrants. I am familiar with, and have participated in investigative methods, including, but not limited to, electronic surveillance, visual surveillance, search warrants, and confidential informants.

3. The statements contained in this affidavit are based on conversations with other law enforcement officers, a review of relevant police reports and body worn camera footage by officers of the Detroit Police Department, and my involvement in this investigation. This affidavit does not include all facts known to law enforcement related to this investigation. This affidavit provides information necessary to establish probable cause that Robert Manard JONES violated 18 U.S.C. § 922 (g)(1), felon in possession of a firearm.

## **II. PROBABLE CAUSE**

4. On June 20, 2020, Detroit Police Department (DPD) officers on patrol in the area near Haverhill Street and Bremen Street, Detroit MI observed JONES walking northbound on Haverhill on the sidewalk on the west side of the street.

5. DPD officers observed a black handle and a portion of a silver slide of a pistol on JONES's right hip protruding out of his shorts. When JONES observed the DPD unit he fled on foot westbound through a backyard.

6. DPD officers pursued JONES on foot through the backyard on to Buckingham Street where JONES fell in the street and was apprehended by DPD officers. The firearm observed by DPD officers was no longer on the hip of JONES. DPD officers retraced the route JONES fled and discovered the observed firearm, loaded, alongside a residence on Buckingham Street, one street west from which JONES fled.

7. After JONES was apprehended and placed in the rear of a DPD police car, a DPD officer asked if a cellular phone that was recovered from the scene belonged to JONES. JONES acknowledged the cellular phone was his and then made an excited utterance, "I got a lot of money on me, man, that's all it was." While JONES was being moved from one DPD vehicle to another, a DPD officer asked JONES if he was a valid Michigan CPL (Concealed Pistol License) holder, to which JONES responded, "No". JONES was then advised he was being arrested for carrying a concealed weapon.



8. The firearm was a SCCY pistol, model CPX-2, 9 mm, Serial Number 393340, loaded with one (1) live round in the chamber and ten (10) live rounds in the magazine which was inserted inside the firearm. The firearm was queried in law enforcement databases and was determined to be reported stolen out of Bloomfield Township, Michigan in 2018.

9. On July 13, 2020, a review of JONES's criminal history revealed prior felony convictions, in the State of Michigan, for the following:

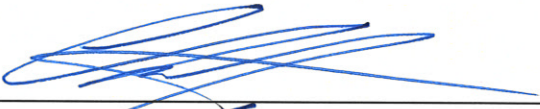
- a. 2013 – Assault with Intent to do Great Bodily Harm Less Than Murder;
- b. 2016 – Identity Theft;
- c. 2016 – Attempt-False Pretenses.

10. On April 1, 2013, JONES was sentenced to 38 months to 10 years in the Michigan Department of Corrections for felony assault with intent to do great bodily harm less than murder. Given the charge, the prison sentence, and his convictions for other felonies, JONES knew that he was a felon at the time he possessed the SCCY pistol, model CPX-2, 9 mm firearm.

11. On July 13, 2020, certified firearms interstate nexus expert ATF SA David Salazar concluded that the aforementioned pistol meets the federal definition of a firearm and was manufactured outside the State of Michigan, thereby affecting interstate commerce.

### III. CONCLUSION

12. Based on the foregoing, probable cause exists that Robert Manard JONES, knowing that he had previously been convicted of a crime punishable by a term of incarceration exceeding one year, did knowingly and intentionally possess a firearm, which had traveled in and affected interstate commerce, in violation of 18 U.S.C. § 922(g)(1).




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Christopher E. Loperfido  
ATF Special Agent

Sword to before me and signed in my presence  
and/or by reliable means.

Date: February 9, 2021



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Kimberly G. Altman  
United States Magistrate Judge

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Case No.

Case: 2:21-mj-30067  
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## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
(name of person to be arrested) ROBERT MANARD JONES,  
who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☒ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 922 (g)(1) - Felon in possession of a firearm

Date: February 9, 2021

City and state: Detroit, MI



*Issuing officer's signature*

Kimberly G. Altman, United States Magistrate Judge

*Printed name and title*

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

*Arresting officer's signature*

*Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only  
and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: ROBERT MANARD JONES

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties:

\_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: 12/19/1987

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks:

\_\_\_\_\_

History of violence, weapons, drug use:

\_\_\_\_\_

Known family, friends, and other associates (*name, relation, address, phone number*):

\_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto:

\_\_\_\_\_

Investigative agency and address:

\_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*):

\_\_\_\_\_

Date of last contact with pretrial services or probation officer (*if applicable*):

\_\_\_\_\_